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VIA ELECTRONIC FILING

July 8, 2013

Honorable Jeffrey C. Cohen
Acting Secretary
New York State Public Service Commission
Three Empire State Plaza
Albany, NY 12223-1350

Re: Case 13-E-0199 – In the Matter of Electric Vehicle Policies

Dear Acting Secretary Cohen:

In response to the Notice of New Proceeding and Seeking Comments issued May 22, 2013 in the above matter, Central Hudson Gas & Electric Corporation, Consolidated Edison Company of New York, Inc., New York State Electric & Gas Corporation, Niagara Mohawk Power Corporation d/b/a National Grid, Orange and Rockland Utilities, Inc., and Rochester Gas and Electric Corporation (collectively, the "Joint Utilities") respectfully submit for filing the attached joint comments.

Thank you for your time and attention.

Respectfully submitted,

/s/ Kara J. Krueger

Kara J. Krueger

Enc.

cc: Active Parties in Case 13-E-0199 (via electronic mail)

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STATE OF NEW YORK
PUBLIC SERVICE COMMISSION

In the Matter of Electric Vehicle Policies — Case 13-E-0199

INITIAL COMMENTS OF THE JOINT UTILITIES

CENTRAL HUDSON GAS & ELECTRIC CORPORATION, CONSOLIDATED EDISON COMPANY OF NEW YORK, INC., NEW YORK STATE ELECTRIC & GAS CORPORATION, NIAGARA MOHAWK POWER CORPORATION d/b/a NATIONAL GRID, ORANGE AND ROCKLAND UTILITIES, INC., AND ROCHESTER GAS AND ELECTRIC CORPORATION

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Dated: July 8, 2013

STATE OF NEW YORK
PUBLIC SERVICE COMMISSION

In the Matter of Electric Vehicle Policies Case 13-E-0199

INITIAL COMMENTS OF THE JOINT UTILITIES

Central Hudson Gas & Electric Corporation, Consolidated Edison Company of New York, Inc. ("Con Edison"), New York State Electric & Gas Corporation, Niagara Mohawk Power Corporation d/b/a National Grid ("National Grid"), Orange and Rockland Utilities, Inc. ("O&R"), and Rochester Gas and Electric Corporation (collectively, the "Joint Utilities") submit the following joint comments in response to the Notice of New Proceeding and Seeking Comments (the "Notice") issued May 22, 2013 by the New York State Public Service Commission ("Commission") in the above matter. The Notice seeks comment on the Commission's potential regulatory oversight of plug-in electric vehicles ("PEVs") as well as on other issues associated with PEVs to assist the Commission in evaluating its role and the role of the Joint Utilities with respect to this emerging technology.

I. BACKGROUND

PEVs have emerged as a technology favorable to social, economic, and environmental policies. PEVs have the potential to dramatically reduce air pollution, petroleum consumption, and greenhouse gas emissions, thereby benefitting both consumers and the environment.[1] PEVs reduce greenhouse gas emissions by 75% and

[1] Deborah Gordon et al., *Policy Priorities for Advancing the U.S. Electric Vehicle Market*, Carnegie Endowment for International Peace (Sept. 2012), http://carnegieendowment.org/files/electric_vehicles.pdf, at 3 (hereinafter "Carnegie Papers").

55% as compared to conventional gasoline-powered vehicles and hybrid vehicles, respectively.[2] PEVs may provide further opportunity to reduce greenhouse gas emissions where the electricity used to power these cars has the potential to be produced by sustainable energy sources, such as solar and wind power.[3] Additionally, PEVs can reduce consumer fuel costs by up to eighty percent, which will not only decrease consumer fuel budgets but also reduce American reliance on expensive imported petroleum.[4] In response to the demonstrated benefits of PEV usage, numerous states have adopted or proposed PEV favorable policies to encourage market growth for this technology.

In January 2013, Governor Cuomo announced the State's intention to create the Charge New York program to "invest in an electric car network to reduce reliance on fossil fuels, installing a statewide network of charging stations."[5] Through this program, the State seeks to facilitate the use and operation of electric vehicle charging equipment ("EVCE" or "charging stations"), both public and private, and PEVs. Governor Cuomo projects that the number of PEVs in operation in New York State could increase from less than 3,000 today to as many as 30,000-40,000 by 2018.[6] With the market for PEVs potentially expanding, the need for and extent of regulatory oversight have emerged as issues for discussion and resolution. Among the issues is the Commission's potential

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[2] *Taking Charge: Establishing California Leadership in the Plug-in Electric Vehicle Marketplace*, California Plug-in Electric Vehicle Collaborative (Dec. 2010), http://www.evcollaborative.org/sites/all/themes/pev/files/docs/Taking_Charge_final2.pdf, at 13 (hereinafter "California Collaborative").

[3] *Exploring Electric Vehicle Adoption in New York City*, PlaNYC (Jan. 2010), http://www.nyc.gov/html/om/pdf/2010/pr10_nyc_electric_vehicle_adoption_study.pdf, at 6.

[4] *See* California Collaborative, *supra* note 2, at 35.

[5] Andrew Cuomo, Governor, State of New York, State of the State Address (Jan. 9, 2013).

[6] Case 13-E-0199, *In the Matter of Electric Vehicle Policies*, Notice of New Proceeding and Seeking Comments (issued May 22, 2013), at 1.

jurisdiction over charging stations. For ease of review, the Joint Utilities will address the questions posed by the Commission in the order in which they appear in the Notice.

II. DISCUSSION

1. To what extent and in what ways would the development of consumer acceptance and use of electric vehicles and of the supporting services for electric vehicles be affected by the Commission's determination that it does or does not have direct jurisdiction over publicly available Charging Stations, their operators or the transaction between publicly available Charging Station operators and members of the public?

The Joint Utilities do not believe that the Commission should exercise jurisdiction over the operation and end-use of charging stations. Charging stations operate in the marketplace similar to other businesses that consume electricity for end-uses, such as data farms, laundry services or refrigeration.[7] These services do more than simply offer electric commodity for resale; rather, they sell a bundled product that includes such components as fees for the use of the equipment, the real estate upon which the facility is located, the billing services associated with the facility, as well as the cost of the electric commodity. Based on the nature of the use and service, the use and operation of charging stations is not within the customer-utility relationship and is best characterized as a consumer-charging service rather than the sale of electricity. This position has been supported by the legislatures and public utility commissions in ten other states, where they have determined that charging stations that operate "for the sole purpose of providing electricity as a transportation fuel do not fall into the definition of a 'public

[7] Charging stations are also similar to compressed natural gas stations ("CNG stations"), which provide a clean, alternative fuel source. The price charged by utilities for public use of CNG stations is governed by each utility's tariff; however, the price third party owners charge public consumers is not presently regulated.

utility' and therefore are not subject to regulation as such an entity."[8] Therefore, the Joint Utilities do not believe that Commission jurisdiction over the relationship between customers and charging station owners/operators is warranted.

Furthermore, the Joint Utilities do not believe it is in the public interest for the Commission to assert jurisdiction over charging stations as it has the potential to inhibit the market for competition and innovation.[9] PEVs and charging stations are likely to foster a competitive market where end-users will have the ability to choose among multiple providers based on numerous factors, including price, convenience, and location. The Commission's jurisdiction over charging stations would likely impose additional administrative burdens upon charging station owners/operators, such as filing a tariff or complying with Commission regulations, which may deter marketplace participation. Such deterrence would not support the policy objectives set forth by state agencies, which seek to facilitate the use of electric vehicles and charging stations. Thus, the Joint Utilities believe that the inherent competition in the market obviates the need for additional Commission oversight. Moreover, as noted above, any additional exercise of jurisdiction by the Commission has significant potential to stifle the marketplace for this emerging technology.

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[8] *Lessons Learned – The EV Project Regulatory Issues and Utility EV Rates*, ECOtality North America (Mar. 14, 2013), http://www.theevproject.com/cms-assets/documents/103425-835189.ri-2.pdf, at 4 (hereinafter "EV Project"). The ten states noted are California, Colorado, Florida, Hawaii, Illinois, Maryland, Minnesota, Oregon, Virginia, and Washington.

[9] *Id.* at 2 ("The regulation of an EVSP ("Electric Vehicle Service Provider") as a public utility creates a burdensome operating environment for the emerging EVSP industry, undermining the creation of a competitive market for EV charging services and the rapid deployment of charging infrastructure. For a competitive EV services market to develop that will use private capital to deploy charging infrastructure, it is imperative that an EVSP not be regulated as an electric utility.")

Additionally, the Joint Utilities would also note that in Case 11-M-0710 the Commission reviewed the regulations applicable to master-metering and submetering.[10] The Commission included EVCE in the definition of "parking facilities" and allowed customers to master-meter or submeter parking facilities utilizing EVCE without Commission approval.[11] Given the relaxed regulatory oversight to applicable master-metered and submetered charging stations, it would be inconsistent to assert jurisdiction and impose additional regulations on charging stations as it would provide for disparate treatment among charging station owners/operators.

For the reasons noted above, the Joint Utilities are of the opinion that Commission should not assert jurisdiction over the owner/operators of EVCEs.

2. In determining whether the provisions of the Public Service Law provide it with jurisdiction, should the Commission consider the manner in which a customer is billed for electric vehicle charging services, *e.g.*, per kWh, per hour, day, month, etc?

The Commission's determination as to whether it has jurisdiction over charging stations should not be driven by the pricing methodology established. The rate paid for the use of electricity should be dictated by the charging station's load, which corresponds with a service classification and rate under each electric utility's respective tariff. Pursuant to its jurisdiction, the Commission has reviewed and approved such tariffs to ensure that the rates charged are just and reasonable. Owners/operators of charging stations should, therefore, be able to develop pricing for a customer refuel (and any other pricing combinations or service add-ons) in any manner that they choose. For example, a charging station could provide the charge for free to the owner of a PEV if the owner is

[10] Case 11-M-0710, *In the Matter of Reviewing and Amending the Electric Submetering Regulations, 16 NYCRR Part 96*, Memorandum and Resolution Adopting Residential Electric Submetering Regulations (issued and effective December 18, 2012).
[11] *Id.* at 41, 43.

shopping in nearby stores and returns with validation receipts from the stores. Charging station owners would be responsible for the cost of electricity delivered to the charging stations, but the customer receiving a refuel of his/her electric car would not be charged. In other circumstances, the charging station could bundle other services provided while customers await their recharge of the electric vehicles. The Joint Utilities do note, however, that charging a specific kWh charge for resale is currently prohibited in many of the Joint Utilities' tariffs unless the charging station is submetered in accordance with the Commission's regulations.[12] Thus, the Joint Utilities believe that the Commission's existing jurisdiction over the rate design applicable to charging stations is sufficient to assert adequate regulatory control in the marketplace.

3. If the commenter argues that the Commission should assert jurisdiction over publicly available Charging Stations and their operators, how should the Commission exercise that jurisdiction? For example, should public Charging Stations and their operators be subject to rate regulation?

The Joint Utilities reiterate their position that the public is better served if the Commission only regulates the sale from the utility to the charging station and competition in the marketplace dictates how the owner/operator charges end-use customers for the use of the station. If the Commission does decide to assert jurisdiction, the Joint Utilities believe that charging stations should be granted lightened regulation, similar to that afforded to wholesale generators participating in competitive electric markets.

[12] The Joint Utilities propose that the Commission allow tariff modifications to be made by the electric utilities to allow for an exception for charging stations where appropriate.

4. Should the Commission allow electric distribution utilities operating in New York State to own or operate Charging Stations: (a) as part of their regulated operations? (b) segregated from their regulated operations, treating Charging Station assets as nonutility property and revenues and expenses related to Charging Station operations as revenues and expenses from nonutility operations?

The Commission should allow utilities the flexibility to own and operate charging stations in situations where appropriate, either as part of their regulated operations or as non-utility operations. If the Commission were to allow for the regulated ownership and operation of public charging stations, the Joint Utilities believe that it would be prudent to provide the utilities with the discretion and flexibility to propose and collaborate with the Commission and stakeholders on an appropriate approach to respond to market and technological advances. Furthermore, where charging stations are located on utility-owned properties for work-related use by employees and PEV fleets, the Commission should not place restrictions on the ownership and operation of those charging stations and should allow for normal ratemaking treatment of that equipment.

5. Should unregulated affiliates of electric distribution utilities operating in New York State own or operate Charging Stations?

The Joint Utilities believe that unregulated affiliates of electric distribution utilities should be permitted to own or operate charging stations provided that all affiliate business rules are followed.

6. State-wide, the number of PEVs has increased from 962 in May 2012 to 3,931 in April 2013. Based on Department of Motor Vehicle Records, the concentration of PEVs by zip code can be ascertained.

a. What steps can be taken to ensure that utilities are aware of new EVCE locations so they can proactively address any necessary distribution facility upgrades?

There is currently no formal regulatory reporting requirement specifically for EVCEs. The utilities may be aware of commercial EVCE installations because

commercial entities generally operate PEVs as a fleet and would therefore require an electrical service upgrade to adequately serve a PEV fleet. However, residential customers may not require an upgrade to serve their EVCE and have the potential to go unrecorded indefinitely. Early tracking and monitoring of EVCE usage and PEV information is beneficial to the utilities' infrastructure planning and policy and the overall safety of the electric system.[13] Without the necessary data, the utilities may not be able to support and adapt to PEV and EVCE usage in the appropriate time frame. Other government agencies, such as the New York State Department of Motor Vehicles ("DMV") or the New York State Energy Research Development Authority ("NYSERDA"), should encourage or mandate consumer-utility reporting requirements to help facilitate a comprehensive understanding of PEV and EVCE usage.

The DMV provides general information regarding new residential PEV owners to Con Edison and O&R. Con Edison and O&R receive this information on an aggregate basis by zip code, consistent with applicable customer privacy restrictions, and use the information to assist in resource planning for their respective electric systems.[14] In being able to plan for and adjust to PEV expansion and concentration in certain portions of the service territory, Con Edison and O&R are able to safely operate their infrastructure and prevent the overloading of equipment, which has proven beneficial to those utilities.[15] Accordingly, the Joint Utilities suggest that the Commission encourage the ongoing

[13] *See* California Collaborative, *supra* note 2, at 44, 47.
[14] The information provided includes the make and model of the vehicle. This information is important because it indicates to Con Edison and O&R that a newly registered vehicle is a hybrid gas/electric vehicle or an all-electric vehicle, which may have different impacts on the electrical system.
[15] While the information currently provided has proven beneficial, the Joint Utilities believe that, if possible, more information could be made available to the utilities, such as customer address, to further aid the utilities in planning for and reacting to PEV expansion.

coordination between the utilities and the DMV, including formalizing and standardizing the disclosure process.

NYSERDA presently offers financial incentive programs to eligible customers that purchase alternative fuel vehicles, such as PEVs.[16] To aid utilities in planning and strategy, the Commission could direct NYSERDA to require customer disclosure of PEV or EVCE installation directly to the corresponding electric utility provider as a participation requirement of the financial incentive program. This would provide another means by which the utilities could track and plan for PEV and EVCE expansion.

The Joint Utilities recommend that the Commission and other appropriate governmental agencies review the proposals contained within this section to determine the most effective methods to allow utilities to proactively address any distribution issues that may arise as a result of increased PEV usage.

b. What customer privacy concerns need to be addressed?

The Joint Utilities are extremely cognizant of the need to protect and preserve consumer privacy and confidential customer information. However, the Joint Utilities do not believe that customer privacy concerns will arise if conversations regarding PEVs or charging stations take place directly between the utility and its customers, or such information is shared at an aggregate level, as noted above. Either of these approaches will reduce the number of parties exposed to potentially sensitive customer information and protect against the erroneous disclosure of confidential customer information. The Joint Utilities are accustomed to treating customer information confidentially (*e.g.*, EEPS program applications) and have established protocols for assuring privacy of customer

[16] *Alternative Fuel Vehicle Program*, NYSERDA, http://www.nyserda.ny.gov/Energy-Innovation-and-Business-Development/Research-and-Development/Transportation/Alternative-Fuel-Vehicles.aspx (last updated May 23, 2013).

information. Therefore, the Joint Utilities do not envision any unique customer metering/billing privacy issues that will need to be addressed in regard to PEVs and charging stations that are not already covered by the Commission's existing customer confidentiality guidelines for securing customer consent and maintaining the confidentiality of customer information and by existing utility practices.

c. If distribution facility upgrades are necessary to accommodate PEV charging, should such costs be shared among all customers (*i.e.*, rate-based), or allocated in some other way?

The Joint Utilities believe that customer upgrades to the electric system as a result of EVCE installation should be treated akin to other upgrades on the system. Generally, delivery service costs for customers are recovered through rates and, pursuant to utility rate plans, customers with greater usage, whether through volumetric or demand-based rates, have higher service bills. Therefore, to the extent that a customer's EVCE increases his/her usage, the delivery and commodity portion of the bill will increase accordingly. With respect to the cost for installation of new or upgraded electric facilities, these costs would be borne by the customer installing the EVCE in accordance with Commission regulations and the customer contribution procedures contained within each utility's tariff and service bulletins. Allocating the costs in this way is consistent with current practices that do not differentiate among similarly situated customers.

d. At what level of PEV use would there be transmission level performance impacts? Are there any strategies that could minimize such impacts?

Bulk power impacts resulting from PEV use and charging are not likely in the foreseeable future.[17] While adoption rates for PEVs have steadily grown over the past few years, present levels indicate that PEVs and EVCE will not impact the system for some time and therefore do not need to be immediately addressed in the utilities' transmission plans. This is due, in part, to the fact that electric system impacts from PEVs are expected to be localized on the distribution system in areas where PEV use is clustered.

It is anticipated that residential charging will occur more frequently during the evening and should not impact bulk power system peaks. It should be noted, however, that PEV charging may impact local network peaks because residential networks tend to peak in the evening. There may also be an impact on the system if these residential owners/operators charge their PEVs during the daytime, for example through a commercial or workplace charging station. Additionally, if commercial fleets employ PEVs, it is likely that many of these fleets will charge their vehicles in the evening hours when the business is not in operation. Thus, the Joint Utilities anticipate a distribution level impact on the electrical system as opposed to the transmission level and will make system improvements accordingly.

[17] *See generally Assessment of Plug-in Electric Vehicle Integration with ISO/RTO Systems*, KEMA & ISO/RTO Council (Mar, 2010), http://www.isorto.org/atf/cf/%7B5B4E85C6-7EAC-40A0-8DC3-003829518EBD%7D/IRC_Report_Assessment_of_Plug-in_Electric_Vehicle_Integration_with_ISO-RTO_Systems_03232010.pdf, at 61-63 (discussing the responses to and timelines for potential PEV penetration).

e. To what extent can the State's solar photovoltaic (PV) policies, under the NY Sun initiative, be utilized to offset potential increases in peak demand that may result from the expanded use of EVCE, particularly at publicly available charging stations?

The Joint Utilities do not foresee solar photovoltaic ("PV") production as a viable near-term source of energy for charging stations. Privately owned PEVs are likely to be charged in the evening hours or after midnight for those customers responding to TOU price signals, whereas solar PV energy production is the highest at noon and lower in the morning and afternoon.[18] The intermittent nature of solar PV production may also affect the ability to adequately charge a PEV in instances where solar PV output is limited (*e.g.* when snowing or cloudy) or not available (*e.g.* at night). Accordingly, it is unlikely that there will be a high coincidence in load between the times in which PEVs will be charged and when solar PV sources are producing energy. With respect to publicly available charging stations in areas such as commuter parking lots, charging will be intermittent throughout the day and coincidence between loads is also likely to vary significantly based on the location of the charging station, PEV penetration in the area, and the solar PV production on those days. Absent substantial coincidence in load and dramatic advances with storage technology, PEVs will not be sufficiently able to utilize the energy produced by solar PV installations.[19]

Some of the utilities are presently working with various smart grid working groups to develop standards and methodologies to measure the impact of PEVs and the communication capabilities for grid-connected distributed generation resources. These

[18] According to one study, between seventy-six and eighty-one percent of PEVcharging by private owners was performed at home in 2012. Garrett Beauregard, *Fact DC Charging for Electric Vehicles*, ECOtality North America (Apr. 9, 2013), http://avt.inel.gov/pdf/EVProj/108217-328847.evp.pdf, at 8.

[19] Additionally, to meet the Level 2 (*i.e.*, 240 volt) PEV charging demand of approximately 8 kW, customers would be required to install a larger array of solar PV panels, which may not be feasible or practicable for all customers.

collaboratives include discussion regarding the use and viability of solar PV technologies in conjunction with PEVs. It is envisioned that such collaboratives will provide guidance to the utilities' planning for future grid modernization.

7. How should the Commission exercise its regulatory authority to ensure that PEV charging, both at Charging Stations and in private locations, occurs in a manner that is consistent with grid capabilities, *e.g.*, through time of use (TOU) or other rate structures?

The Joint Utilities recommend that each utility should be granted the latitude needed to respond to PEV growth within its service territory. Well-crafted TOU rates may be able to influence consumer charging behavior and encourage PEV charging during off peak hours designated by the utilities.[20] Charging during off-peak hours may not only help customers reduce their energy bills, but may also help the utilities to manage usage and minimize the overall impact of PEVS on the electric system. Given the marginal projected growth and impact of PEVs within the next few years, it does not seem necessary to expedite a TOU rate to facilitate the efficient use of the grid's capabilities. Moreover, some of the utilities presently have in place or are working towards establishing varying TOU rate structures.[21] The utilities should therefore be encouraged to develop voluntary TOU rates for their customers, as appropriate. This process will provide the utilities with the autonomy needed to establish the necessary

[20] The first-year preliminary results of San Diego Gas & Electric Company's multi-year electric vehicle rate experiment revealed that, after implementation of experimental TOU rates, sixty-three percent of all charging events began between 12 AM and 1 AM and eighty percent of total customer charging occurred during the super off-peak period. Michael Perry et. al, *First Year Evaluation for San Diego Gas & Electric's Electric Vehicle Pilot*, Freeman, Sullivan & Co. (Dec. 21, 2012), http://www.sdge.com/sites/default/files/regulatory/Attachment%204-SDG%26E%20ELECTRIC%20VEHICLE%20REPORT.pdf, at 40.

[21] Con Edison's TOU rate is under review in its current rate case and National Grid will commence a collaborative with Department of Public Service Staff in the upcoming months to discuss distribution delivery and commodity TOU rates for residential customers.

internal mechanisms to support any newly created rates approved by the Commission and facilitate the development of rates appropriate for each utility's customer base.

8. Do existing rate structures need to be modified to accommodate the evolution of the PEV market? Are additional measures needed to increase the use of TOU rates for EVCE?

As stated in the Joint Utilities' response to the previous question, TOU rates for each utility will likely differ based on the utility's assets and the penetration rate of PEVs in the utility's customer base. Existing rate structures may therefore need to be augmented to accommodate PEVs and charging stations. The utilities could also consider optimizing TOU rates, examining and analyzing usage patterns and their system impacts, and developing outreach efforts for customers, such as online tools to evaluate the various rates applicable to their usage. The Joint Utilities believe these modifications will be best addressed through independent utility filings rather than a generic Commission proceeding.[22] Additionally, some of the utilities are already working with PEV dealerships to provide access to rate information, a process which could be extended to all utilities and EVCE suppliers with Commission encouragement.

9. What additional metering policies or protocols (*e.g.*, dual metering, submetering) may be needed to accommodate various EVCE options?

Current metering policies and protocols may require revision to facilitate the growth of PEVs and charging stations. One issue that could prove to be a barrier to PEV and EVCE growth is the cost of purchasing, installing, and billing a second metered account if a customer were to separate the service to the house and the charging station.[23]

[22] The Commission is presently evaluating Con Edison's TOU delivery rates. Developments/rulings from this proceeding could serve as a reference point for other utilities as they independently evaluate their TOU rates.

[23] *See* EV Project, *supra* note 8, at 10. It should also be noted that billing would include a separate customer charge for the additional meter.

On average, it is estimated that the cost to install a second meter and electrical service panel ranges from $2,000 to $10,000, including equipment costs and labor.[24] Therefore, it may be more beneficial for customers to place their entire house on a TOU rate to maximize the energy savings and avoid the additional costs incurred through the installation of a second meter and service panel. Customers will have to seriously consider the feasibility of installing a second meter and service panel when purchasing a PEV or charging station, which will vary based on the customer's service classification and service provided. It is imperative that, until a permanent framework for customers is established, the Joint Utilities be afforded the flexibility to investigate alternative metering configurations and technologies to present more cost-effective solutions for their customers to respond to price signals and grid conditions and support this growing market.

10. What risks face consumers in the market for EV charging services and how does, or should the market or other entities address those risks?

As with other emerging technologies, customers bear the risk associated with the purchase of PEVs and charging stations. Customers in today's marketplace are well aware of the risks associated with purchases of vehicles solely fueled through the use of electricity, which include, but are not limited to, limitations on the range of travel and the absence of public charging station infrastructure. The Joint Utilities believe that customers can independently review the PEV information available in the various forms of media and make educated, rational decisions regarding the purchase and use of PEVs. Additionally, given that the market for PEVs is still relatively new and developing, some, if not all, of these risks may be mitigated over time. Therefore, the Joint Utilities do not

[24] *See* Pacific Gas & Electric Co., Rate Options, Rate Calculator, http://www.pge.com/myhome/environment/whatyoucando/electricdrivevehicles/rateoptions/index.shtml.

believe that the Commission or the utilities are in a position at this time to address the market risks associated with PEVs.

11. To what extent should outreach efforts integrate PEV and solar PV information?

The Joint Utilities believe that customers can adequately seek and analyze information related to PEVs and PEV manufacturers and dealerships can adequately conduct necessary outreach and education. PEV dealership and manufacturers have in place sophisticated marketing and outreach campaigns to promote PEVs and other forms of alternative fuel vehicles and are best suited to address the concerns of customers within the marketplace. Accordingly, the Joint Utilities do not believe that additional outreach efforts, including information to integrate PEV and solar PV, should be required of the utilities.

III. CONCLUSION

The Joint Utilities urge the Commission to consider the recommendations and observations contained herein when making decisions regarding plug-in electric vehicles and electric vehicle charging stations and the policies applicable thereto. The Joint Utilities believe that these comments provide a framework beneficial to both customers and utilities and will foster the State's goals of expanding PEV and EVCE use in the years to come. The Joint Utilities look forward to working with the Commission and Department of Public Service Staff with respect to the emerging technological growth of PEVs and charging stations.

Respectfully submitted,

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